

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

JOSHUA BONADONA	*	CIVIL ACTION NO.: 1:18-CV-00224
	*	
VERSUS	*	JUDGE DRELL
	*	
LOUISIANA COLLEGE AND	*	MAG. JUDGE HORNSBY
RICK BREWER	*	
	*	

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF DISCOVERY
AND MOTIONS FILING DEADLINES**

MAY IT PLEASE THE COURT:

Plaintiff, Joshua Bonadona and defendants, **Louisiana College and Dr. Rick Brewer**, submit the following Memorandum in Support of their Joint *Motion for Extension* of this Court's deadlines as it pertains to the completion of discovery and the filing of dispositive motions.

Pursuant to the Proposed Plan of Work (Document 20) entered by this Court on June 7, 2018, and by way of this Court's Order of June 6, 2018 (Document 19) the current deadline for completion of discovery is November 23, 2018, and final date for filing dispositive motions is January 8, 2019.

The parties require additional time to complete discovery, including the conduct of certain depositions that were previously noticed but continued, without date, due to matters unforeseen by the parties.

Consequently, the parties request an extension of the deadline for completion of discovery until **December 31, 2018**, and an extension of the time for the filing of dispositive motions to **February 8, 2019**.

The requested extensions are not made for the purpose of delay and will not prejudice either party. The requested extensions also will not necessitate the resetting of any other deadlines established in the Plan of Work and/or the pretrial conference currently set to be held, in chambers, on **May 17, 2019 at 10:30 a.m.**

WHEREFORE, Joshua Bonadona, Louisiana College and Dr. Rick Brewer request that this Court enter an Order granting their Joint Motion for Extension, and to extend of the deadlines for completion of discovery and for the filing of dispositive motions from November 23, 2018 to December 31, 2018 (with regards to completion of discovery), and from January 8, 2019 to February 8, 2019 (with regards to the filing of dispositive motions).

Respectfully Submitted:

/s James R. Bullman

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16th day of November, 2018, served a copy of the foregoing pleading on counsel for all parties to this proceeding either by **e-mailing, faxing or by mailing** the same by United States mail, properly addressed and first class postage prepaid.

DARREN A. PATIN